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November 13, 2023  
VIA CM/ECF

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Honorable Edgardo Ramos  
Courtroom 619  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007  
Tel (212) 805-0294

Re: *FTC v. IQVIA Holdings Inc. and Propel Media, Inc.*, Case No.: 1:23-cv-6188  
(S.D.N.Y.); Letter Motion to Seal Publicly Filed Opposition to Preliminary  
Injunction

Dear Judge Ramos:

Pursuant to this Court's Rule of Individual Practice 3(ii) and section 21.7 of the Court's Electronic Case Filing Rules & Instructions, Defendant IQVIA Holdings Inc. ("IQVIA") respectfully submits this letter motion requesting that the filed redacted version of Defendants' *Memorandum of Law in Opposition to the FTC's Motion for Preliminary Injunction* ("Opposition"), Dkt. No. 198, be sealed in its entirety.

Pursuant to the Amended Protective Order, Dkt. No. 153, IQVIA filed a redacted version of the Opposition on the public record on November 9. Upon re-review the following morning, we identified four additional citations that may include Confidential Information. IQVIA promptly submitted an Emergency Sealing Request with the ECF Help Desk. Out of an abundance of caution, IQVIA is filing a revised public version of the Opposition with these four additional redactions. IQVIA is also filing a revised version of the unredacted Opposition under seal, with the correct redactions highlighted. IQVIA has made no changes to the substance of the Opposition.

For the reasons stated above, IQVIA respectfully moves this Court for an order permitting the entirety of the previously filed redacted version of the Opposition, Dkt. No. 198, to be sealed.

Sincerely,

/s/ Chantale Fiebig

Chantale Fiebig